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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BRIANA LOUISE COUCH,)	Case No.: 2:24-cv-01988-EFB
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
)	
FRANK BISIGNANO,)	
Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended from July 14, 2025, up to and including August 13, 2025. This is the Defendant's first request for an extension.

This matter was assigned on June 19, 2025. Based on a review of the record, undersigned counsel requires additional time to explore settlement options. Defendant apologizes to the Court for any inconvenience caused by this delay. Undersigned counsel contacted Plaintiff's counsel on July 11, 2025, and she had no objection to this request.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: July 11, 2025

/s/ Jacqueline A. Forslund*
(*as authorized via e-mail on July 11, 2025)
JACQUELINE A. FORSLUND
Attorney for Plaintiff

Dated: July 11, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
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By: /s/ Noah Schabacker
NOAH SCHABACKER
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including August 13, 2025, to respond to Plaintiff's Motion for Summary Judgment.

DATED: July 29, 2025


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE